

EXHIBIT 1

Attorney Work Product
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SEC-SEAI TEMPLATE FOR 30b6 DEPOSITION

BATES NO.	DATE	DESCRIPTION
TOPIC:		
1. Your corporate structure, including the identification of departments within Your Company, and their functions, policies, practices and systems, and the identification of any individuals that had managerial responsibility for the manufacture, purchase, sale, pricing or distribution of CRT Products.		
SEAI-CRT-00213479	1/18/07	E-mail from J. [redacted] dated 1/18/07. Subject: "We are looking for a new CRT product." [redacted]
SEAI-CRT-00244916	3/10/08	E-mail from J. [redacted] dated 3/10/08. Subject: "We are looking for a new CRT product." [redacted]
SEAI-CRT-00603198	12/6/02	E-mail from J. [redacted] dated 12/6/02. Subject: "We are looking for a new CRT product." [redacted]
SEAI-CRT-00603200	12/5/02	E-mail string involving [redacted] dated 12/5/02. Subject: "We are looking for a new CRT product." [redacted]
SEAI-CRT-00605589	2/21/02	E-mail string between [redacted] dated 2/21/02. Subject: "We are looking for a new CRT product." [redacted]

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TOPIC:

2. The identity and general description of the CRT Products you manufactured, purchased, sold, or distributed, including the major product specification features of the CRT Products produced by Your Company (*i.e.*, size, resolution, etc.) and the major components for each type of CRT Product produced.

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4. The types or categories of customers to whom you sold CRT Products, including: (a) a description of each type or category; (b) the prices and terms offered to each type or category; and (c) the percentage of sales of CRT Products sold to each type or category.

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[illegible]

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TOPIC:

6. The distribution channels or classes of trade through which You sold CRT Products, including: (a) any entities within Your Company, including those entities listed in Definition 10 above; (b) other defendants; (c) other business entities, including, but not limited to, original equipment manufacturers ("OEMs"), original display manufacturers ("ODMs"), retailers, mass merchandisers, e-commerce, and distributors; and (d) whether You have ever outsourced the manufacturing of the CRT Products You sold to a third party.

SEAI-CRT-00114792	4/3/06	E-mail
SEAI-CRT-00202060		Spreadsheets
SEAI-CRT-00202224	8/1/???	August
SEAI-CRT-00213479	1/18/07	E-mails
SEAI-CRT-00235511		"
SEAI-CRT-00606267	6/9/00	Journal or
SEAI-CRT-00607976	12/14/04	Channels

TOPIC:

A description of Your Company's use of model numbers and model number decoders for CRT Products, including: (a) whether the model numbers are standardized; (b) what the codes associated with the model numbers mean; (c) where to find model number decoders, or any other information Your Company uses to interpret model numbers; (d) whether the model numbers used by Your Company relate to CRT Product specifications such as tube size and dimension; and (e) any industry standards Your Company uses when assigning model numbers to CRT Products.

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TOPIC:

13. Your policies and practices for setting the price of CRT Products, including consideration or use of the following:
 (a) formulas; (b) factors, such as cost, supply, demand, competitor pricing, market forecasts, and product specifications; (c) price guidelines or price lists; (d) negotiations or negotiated prices; (e) spot market prices; (f) contracts or contract prices; (g) purchase orders; (h) customer type; and (i) distribution channels.

SEAL-CRT-00114989	10/29/03	E-mail from
SEAL-CRT-00202224	8/1/????	mc
SEAL-CRT-00213479	1/18/07	F
SEAL-CRT-00228980	6/12/07	listed by model number
SEAL-CRT-00603198	12/6/02	E-mail from Kc
SEAL-CRT-00603200	12/5/02	E-mail string involving
SEAL-CRT-00605589	2/21/02	E-mail

15. Your use of discounts or rebates in connection with the sale of Your CRT Products, including how You recorded such discounts or rebates, and the identity and location of documents or data recording discounts or rebates.

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SEAI-CRT-00605589	2/21/02	E-mail string between...
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TOPIC:

19. Your knowledge, use, and tracking of retail prices ("ASPs"), or "street prices" for CRT Finished Products by You or any other CRT Finished Product manufacturer.

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